

Tri-Lake Facility Joint Use Committee, March 11

Changes in nutrient reporting increase costs

By Jim Kendrick

On March 11, the Tri-Lakes Wastewater Treatment Facility Joint Use Committee (JUC) approved a voluntary payment of \$579 for additional work performed by the Colorado Data Sharing Network (CDSN) to respond to nine changes made by the Colorado Water Quality Control Division (WQCD) to the annual nutrient reporting format required by Control Regulation 85.

The Arkansas and Fountain Coalition for Rural/Urban River Evaluation (AF CURE) contract with CDSN standardizes the method for reporting all total phosphorus and total nitrogen monthly testing for every AF CURE member. CDSN has been performing reporting for several years for the 13-year-old South Platte Coalition for Urban River Evaluation (SP CURE), which served as the model for the creation of AF CURE.

The Tri-Lakes facility operates as a separate public utility and is jointly owned, in equal one-third shares, by Monument Sanitation District, Palmer Lake Sanitation District, and Woodmoor Water and Sanitation District. The three-member JUC acts as the board of the facility and consists of one director from each of the three owner districts' boards: President Jim Taylor of Woodmoor, Vice President Dale Smith of Palmer Lake, and Secretary/Treasurer Chuck Robinove of Monument. Woodmoor Director Rich Strom filled in as Taylor's alternate at this meeting.

Several other district board members, district managers, and district staff from each of the three owner districts also attended the meeting, as well as Tri-Lakes Facility Manager Bill Burks.

March 4 AF CURE meeting

There was a lengthy contentious discussion of the March 4 AF CURE meeting request from CDSN for an additional \$579. Woodmoor's share of this cost was \$193—a cost of 6 cents per Woodmoor customer. Strom objected to the "open-ended process" of state regulators forcing changes resulting in cost overruns by CDSN for training and retraining all the AF CURE wastewater operators several times on how to submit the first annual report on Control Regulation 85 nutrient data. The state and the EPA require reports on the monthly removal of phosphorus and nitrogen compounds from wastewater.

Wicklund replied that this is a new program for CDSN, and it has worked very hard to help AF CURE member facilities meet the new, unprecedented Reg. 85 requirement and there was no contingency funding by AF CURE to pay for this predictable learning curve. The approximate CDSN cost overrun per entity for all the additional wastewater facility staff training is about \$1,600 due to the collective intentional Letter of Intent violation by all AF CURE participants.

However, CDSN asked for only an additional voluntary \$579 per wastewater

entity for 2013 only. The learning curve will be much smaller for final data entry for all of 2014 in the spring of 2015.

Background: CDSN is a project of the Colorado Water Quality Monitoring Council, a statewide association formed by state water and wastewater entities. It operates in much the same way that AF CURE operates as a project of the Pikes Peak Regional Water Authority. The council's mission is to upload scientifically sound and accessible data available on the web to facilitate an open and informed discussion about water quality in order to facilitate water quality monitoring and seamless data sharing among all interested parties to characterize water quality in Colorado.

For more specific information see:

- www.coloradowaterquality.org/
- www.coloradowaterquality.org/cdsn
- www.coloradowaterquality.org/monitoring_datastorage_reporting

There have been nine changes in reporting formats issued by the Water Quality Control Division (WQCD) to date since Reg. 85 was approved in June 2012. Reg. 85 contained nothing but concentration limits for phosphorus and nitrogen compounds—no guidance, no procedures, and no policies. As a result there has been a rather steep learning curve by division staff who knew very little about how such data would be collected or reported and had to develop the requirement in a difficult iterative trial-and-error fashion with

many objections and suggestions from CDSN, SP CURE, and AF CURE.

Brown and Caldwell, the engineering consultant firm for AF CURE, had recommended that AF CURE use CDSN staff members for technical assistance since they would be providing the same services to SP CURE and would have better economies of scale. They also made an alternative proposal to provide data formatting, though at a higher cost, as a backup plan if CDSN could not provide data services. There would have been cost overruns due to division changes in formatting whether CDSN or Brown and Caldwell provided the service.

The total 2013 CDSN bill for 2014 is \$11,517, with \$2,750 previously billed proportionally to the 11 entities. The remainder to be invoiced is \$797 per entity. The CDSN estimate was 7.5 hours per group but is actually 22 hours per group at this time due to WQCD changing the rules repeatedly and the unexpectedly high demand from individual plant managers for personal training of other facility staff that did not attend the budgeted group training. The current data template is version 9.

Many treatment facilities, including AF CURE members, decided to fill in their own templates due to the frequent changes that demanded more information without formatting instructions. No data entry training for all these division changes was part of the CDSN contract.



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